

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
(RICHMOND DIVISION)**

In Re:

CIRCUIT CITY STORES, INC., et al.,

Debtors.

Chapter 11

Case No. 08-35653-KRH

Jointly Administered

**MOTION FOR LEAVE OF COURT FOR  
ANDREW NAZAR AND/OR JAMES BIRD OF POLSINELLI PC  
TO ATTEND HEARING BY TELEPHONE**

KeyBank National Association (“**Key**”), by counsel, respectfully moves the Court, pursuant to this Motion (the “**Motion**”), for entry of an order, the proposed form of which is attached hereto as **Exhibit A**, authorizing Andrew J. Nazar, Esq. (“**Mr. Nazar**”) and James Bird, Esq. (“**Mr. Bird**”) of Polsinelli PC, counsel to Key and certain lender trusts as referenced in their Entry of Appearance, to appear and participate by telephone at the hearing scheduled for Wednesday, October 7, 2015, at 2:00 p.m. (the “**Hearing**”) in the above-captioned bankruptcy cases. Key has replaced Capmark Finance, Inc. (“**Capmark**”) as special servicer for several lender entities involved in this proceeding. Counsel for Key entered their appearance in this action on August 21, 2015 (Docket No. 13755) and an order allowing Mr. Bird and Mr. Nazar to appear *pro hac vice* in this action were entered on September 1, 2015 (Docket No. 13771). Allowing Mr. Nazar and/or Mr. Bird to appear telephonically will not cause any undue hardship to any party herein, would conserve estate resources, and would serve the interests of justice.

WHEREFORE, Key respectfully requests that the Court enter an order granting this Motion and providing for such other and further relief as this Court deems just and proper.

Respectfully Submitted,

KEYBANK NATIONAL ASSOCIATION  
AND CERTAIN LENDER TRUSTS  
By Counsel

Dated: October 5, 2015

POLSINELLI PC

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*Counsel for KeyBank National Association  
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**CERTIFICATE OF SERVICE**

I hereby certify that on the 5th day of October 2015, a true and correct copy of *Motion for Leave of Court for Andrew Nazar and James Bird to Attend Hearing By Telephone* was filed using the Court's CM/ECF service, served electronically to Debtors' counsel, the Trustee, and served on all interested parties by ECF notification from the Court, and served by first-class United States mail, postage prepaid, to:

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